

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MICHAEL GUNN, Administrator of the
Estate of KEILEE FANT, et al.,

Plaintiffs,

V.

THE CITY OF FERGUSON,

Defendant.

Case No. 4-15-CV-00253-AGF

(Class Action)

JOINT MOTION FOR TWO-WEEK EXTENSION

The Parties jointly, through their respective undersigned counsel, move for a two-week extension of time until **January 31, 2024** to file their joint motion for preliminary approval of settlement and in support state:

1. On December 14, 2023, the Parties jointly moved for Entry of Proposed Schedule for Preliminary Approval of Settlement Agreement (the “Joint Motion of Proposed Schedule”) and requested Wednesday, January 17, 2024 be the date by which Plaintiffs were to submit the Parties’ joint motion for preliminary approval of settlement. ECF No. 664. The Court granted this request. ECF No. 665.

2. Since the filing of the December 14, 2023 Joint Motion of Proposed Schedule, the Parties have been working together diligently to finalize the settlement agreement, the motion for preliminary approval and all exhibits thereto. That finalization process is taking slightly longer than anticipated.

3. As a result, the Parties request two additional weeks, until **January 31, 2024**, to finalize the motion for preliminary approval and all settlement-related documents, and to execute the settlement agreement.

WHEREFORE, for these reasons, the Parties request until **January 31, 2024**, to file the motion for preliminary approval of settlement agreement.

Dated: January 17, 2024

Respectfully submitted,

WHITE & CASE LLP

HELLMICH, HILL & RETTER, LLC

By: /s/ Angela Daker

Angela Daker (*pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Phone: 305-371-2700
Email: adaker@whitecase.com

By: /s/ William A. Hellmich

William A. Hellmich, #31182MO
Blake D. Hill, #58926MO
1040 North Clay
Kirkwood, MO 63122
Phone: 314-646-1110
Email: bill@hellmichhillretter.com

Ross E. Elfand (*pro hac vice*)
Iva Popa (*pro hac vice*)
Paula C. Kates (*pro hac vice*)
Luke J. Miller (*pro hac vice*)
Chloe R. Edmonds (*pro hac vice*)
Fabiola Alvelais Aldana (*pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Phone: 212-819-7670
Email: relfand@whitecase.com

Frank Hogue (*pro hac vice*)
701 13th Street NW, #600
Washington, D.C. 20005
Phone: 202-626-3600
Email: fhogue@whitecase.com

—and—

ARCHCITY DEFENDERS

Maureen Hanlon, #70990MO
Blake A. Strode, #68422MO
440 N. 4th Street, Suite 390

Saint Louis, MO 63102
Phone: 855-724-2489
Email: mhanlon@archcitydefenders.org

—and—

CIVIL RIGHTS CORPS

Marco Lopez (*pro hac vice*)
1601 Connecticut Avenue NW, Suite 800
Washington, DC 20009
Phone: 202-844-4975
Email: marco@civilrightscorps.org

—and—

SLU LAW CLINIC

Brendan Roediger, #6287213IL
100 N. Tucker Blvd.
Saint Louis, MO 63101
Phone: 314-977-2778
Email: brendan.roediger@slu.edu

Attorneys for Plaintiffs